

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE INTERCEPT MEDIA, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION

Defendants.

Civil Action No. 1:24-cv-01515-JSR

**MOTION FOR ADMISSION  
*PRO HAC VICE***

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Lauren Carbajal hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Plaintiff The Intercept Media, Inc. in the above-captioned action.

I am a member in good standing of the Bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: March 13, 2024

RESPECTFULLY SUBMITTED,

/s/ Lauren Carbajal

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*Attorneys for Plaintiff*